

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

LEDCOMM LLC,
Plaintiff,

v.

SIGNIFY NORTH AMERICA CORP.,
SIGNIFY HOLDING B.V., and
SIGNIFY N.V.
Defendants.

Civil Action No. 6:20-cv-01056-ADA

**DEFENDANTS' FIRST UNOPPOSED MOTION
FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants Signify North America Corporation, Signify Holding B.V., and Signify N.V. (collectively, "Signify" or "Defendants") file this unopposed motion for extension of time to answer or otherwise respond to Plaintiff LedComm LLC's ("Plaintiff") Complaint (ECF No. 1).

Plaintiff filed its Complaint on November 16, 2020 (ECF No. 1) and requested that a summons issue as to Signify North America Corp. on November 16, 2020 (ECF No. 4). Plaintiff served Signify North America Corp. with process on November 23, 2020, making Signify North America Corp.'s initial deadline to respond December 14, 2020. Plaintiff has not yet served Signify Holding B.V. or Signify N.V. with process or requested service under the Hague Convention.

Plaintiff and Defendants have met and conferred and have agreed that the foreign corporations Signify Holding B.V. and Signify N.V. will waive service of process in exchange for a 90-day extension of time for all Defendants to respond to the Complaint, consistent with the deadline extensions set forth in Fed. R. Civ. P. 12(a)(1)(A)(ii). There is good cause to allow this extension because this agreed extension will avoid the formalities of service via the Hague

Convention or of waiving formal service using Forms AO 398 and 399 in order to arrive at the same answer deadline that would otherwise be in effect if service were waived. Plaintiff and Defendants have further agreed that Signify North America Corp.'s Answer will be due on that same date in the interest of efficiency for both the Court and the parties.

Accordingly, Defendants respectfully request an extension of time up to and including March 10, 2021, to answer or otherwise respond to Plaintiff's Complaint. Counsel for Plaintiff confirmed via email on December 8, 2020 that Plaintiff does not oppose this requested extension of time.

Accordingly, Defendants respectfully request that the Court issue the attached proposed order extending Defendants' time to answer or otherwise respond to Plaintiff's complaint to March 10, 2021.

Dated: December 10, 2020

Respectfully submitted,

By: /s/ Brady Cox

Brady Cox (TX Bar No. 24074084)

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Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on December 10, 2020.

/s/ Brady Cox

Brady Cox